INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

John M. Hamilton
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100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.ai.org/idem

June 16, 1998

Mr. Roger Glendening
Milbank Manufacturing, Inc.
P.O. Box 754
Kokomo, IN 46903-0754

Re: Request for Additional Info., Application No. 80144
Milbank Manufacturing; Howard County

Dear Mr. Glendening:

This letter is in response to a Special Waste Certification Application for the disposal of wastewater treatment filter cake. Staff have reviewed your application and determined that additional information processes that generating the filter cake is needed. Please address the following.

1) Information with your application indicates Milbank runs both galvanized steel and aluminum parts. Please explain what exactly is being done to the surface of both of these types of parts as a result of your five stage wash process.
2) Do any industrial processes at Milbank involve the chemical conversion coating of aluminum?
3) Does Milbank have any electroplating processes on-site?
4) Stage five of Milbank's wash process involves the application of a non-chrome sealer. Does this seal place a coating on the aluminum parts? Please provide a list of ingredients found in the sealer along with their percent composition.

Please submit this information to Ms. Marcia Earl at the following address:

Attn: Ms. Marcia Earl
Indiana Department of Environmental Management
Office of Solid and Hazardous Waste Management
100 North Senate Avenue
Indianapolis, IN 46206-6015

No further action can be taken on your application until this information is received. If you have further questions concerning this matter, please contact me at 317/233-0999.

Sincerely,

Jeffrey A. Workman
Special Waste Section
Solid Waste Facilities Branch
Solid and Hazardous Waste Management

INFORMATION REQUESTED ITEM #1

GALVANIZED MATERIAL
ALL 5 STAGES ARE SPRAY APPLICATION

STAGE 1
GALVANIZED PARTS ARE WASHED WITH "LIQUID FERRO TERJ" (DUBOIS), AN ALKALINE CLEANER USED TO REMOVE ANY DIRT, SHAVINGS OR SOLUBLE OIL FROM THE SURFACE OF THE MATERIAL.

STAGE 2
GALVANIZED PARTS ARE RINSED WITH CITY WATER TO ELIMINATE ANY LIQUID FERRO TERJ THAT MAY HAVE CARRIED OVER FROM STAGE 1.

STAGE 3
GALVANIZED PARTS ARE WASHED WITH "SECURE LOW FOAM" (DUBOIS) WHICH IS A MILD ACIDIC SPRAY USED TO CLEAN AND PREPARE THE SURFACE FOR PAINTING.

STAGE 4
GALVANIZED PARTS ARE RINSED WITH CITY WATER TO ELIMINATE ANY SECURE LOW FOAM THAT MAY HAVE CARRIED OVER FROM STATE 3.

STAGE 5
GALVANIZED PARTS ARE RINSED WITH ICA-503 (DUBOIS) WHICH IS A FINAL RINSE ADDITIVE USED TO PROMOTE BETTER ADHESION FOR THE POWDER PAINT. (SEE ATTACHED MSDS SHEET)

INFORMATION REQUESTED ITEM #1

ALUMINUM MATERIAL
ALL 5 STAGES ARE SPRAY APPLICATION

STAGE 1
ALUMINUM PARTS ARE WASHED WITH "LIQUID FERRO TERJ" (DUBOIS), AN ALKALINE CLEANER USED TO REMOVE ANY DIRT, SHAVINGS OR SOLUBLE OIL FROM THE SURFACE OF THE MATERIAL.

STAGE 2
ALUMINUM PARTS ARE RINSED WITH CITY WATER TO ELIMINATE ANY LIQUID FERRO TERJ THAT MAY HAVE CARRIED OVER FROM STAGE 1.

STAGE 3
ALUMINUM PARTS ARE WASHED WITH "SECURE LOW FOAM" (DUBOIS) WHICH IS A MILD ACIDIC SPRAY USED TO CLEAN AND PREPARE THE SURFACE FOR PAINTING.

STAGE 4
ALUMINUM PARTS ARE RINSED WITH CITY WATER TO ELIMINATE ANY SECURE LOW FOAM THAT MAY HAVE CARRIED OVER FROM STATE 3.

STAGE 5
ALUMINUM PARTS ARE RINSED WITH ICA-503 (DUBOIS) WHICH IS A FINAL RINSE ADDITIVE USED TO PROMOTE BETTER ADHESION FOR THE POWDER PAINT. (SEE ATTACHED MSDS SHEET)

INFORMATION REQUESTED ITEM #2

NO INDUSTRIAL PROCESS AT MILBANK INVOLVES THE CHEMICAL CONVERSION COATING OF ALUMINUM.

INFORMATION REQUESTED ITEM #3

MILBANK DOES NOT HAVE ANY ELECTROPLATING PROCESSES.

INFORMATION REQUESTED ITEM #4

OUR IC-503 (NON CHROM SEALER) DOES NOT PLACE A COATING ON ALUMINUM PARTS. ATTACHED ARE THE MSDS SHEETS.

USE : TANK #5

MATERIAL SAFETY DATA SHEET

Page 1 of 3
Revised 6/30/93
Replaces (None)
Printed 6/15/93

ICA-503

MSDS ID: 02442

I. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: ICA-503
PRODUCT DESCRIPTOR: FINAL RINSE ADDITIVE
MANUFACTURER: DUBOIS CHEMICALS
255 E. 5TH ST.
CINCINNATI, OH 45202
EMERGENCY PHONE NUMBERS: MEDICAL (COLLECT): (303)592-1024
CHEMTREC: (800)424-9300
DUBOIS (24 HOURS): (800)543-4906

II. COMPOSITION/INFORMATION ON INGREDIENTS

INGREDIENT NAME(CAS NUMBER)	%	EXPOSURE LIMITS	UNITS
ALUMINUM CHLOROHYDRATE (SOLUBLE SALTS) (1327-41-9)	50	TLV Z	MG/M3

III. HAZARDS IDENTIFICATION

ROUTES OF ENTRY: INHALATION: NO
SKIN: NO
INGESTION: YES
SIGNS AND SYMPTOMS OF EXPOSURE:
ACUTE: MAY CAUSE EYE IRRITATION
CHRONIC: SAME AS ACUTE
MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE:
SENSITIVE SKIN

IV. FIRST AID MEASURES

EYES: FLUSH THOROUGHLY WITH FRESH WATER FOR AT LEAST 15 MINUTES. GET MEDICAL ATTENTION.
SKIN: FLUSH WITH FRESH WATER, WASH WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHES AND SHOES.
INGESTION: GIVE WATER. DO NOT INDUCE VOMITING. GET MEDICAL ATTENTION.
INHALATION: N/A IN NORMAL OPERATION.

V. FIRE FIGHTING MEASURES

FLASH POINT: N/A DEG F
FLAMMABLE LIMITS IN AIR BY VOLUME: LEL: N/A UEL: N/A
UNUSUAL FIRE OR EXPLOSION HAZARDS: NONE KNOWN
EXTINGUISHING MEDIA: CO2, DRY CHEMICAL, FOAM, WATER
FIRE FIGHTING INSTRUCTIONS: MAY DECOMPOSE TO HYDROGEN CHLORIDE IN FIRE. IF FUMES ARE PRESENT, WEAR SELF CONTAINED BREATHING APPARATUS.
FLAME EXTENSION: N/A IN.

MATERIAL SAFETY DATA SHEET

Page 2 of 3
Revised 6/30/[illegible]5
Replaces (None)
Printed 6/18/[illegible]5

ICA-503

MSDS ID: 02442

VI. ACCIDENTAL RELEASE MEASURES

IF MATERIAL IS RELEASED OR SPILLED: FLUSH SMALL AMOUNTS TO DRAIN. COLLECT AND RETURN LARGE SPILLS TO CONTAINER.

VII. HANDLING AND STORAGE

HANDLING AND STORAGE PRECAUTIONS: DO NOT PRESSURIZE CONTAINER TO EMPTY. IF FROZEN, THAW AND MIX TO MAKE USABLE.

VIII. EXPOSURE CONTROLS/PERSONAL PROTECTION

EYE/FACE PROTECTION: SAFETY GLASSES
PROTECTIVE GLOVES: NON-ABSORBENT
RESPIRATORY PROTECTION: NONE
OTHER PROTECTIVE CLOTHING/EQUIPMENT: NONE
EXPOSURE GUIDELINES: SEE SECTION II FOR DETAILED INFORMATION.

IX. PHYSICAL AND CHEMICAL PROPERTIES

BOILING POINT (F):	220	SPECIFIC GRAVITY:	1.3400
VOLATILE BY VOLUME:	50	SOLUBILITY IN WATER:	100
VAPOR PRESSURE (MMHG):	N/A	AT	
APPEARANCE AND ODOR:	CLEAR TO SLIGHTLY HAZY LIQUID: NO ODOR		

X. STABILITY AND REACTIVITY

CHEMICAL STABILITY: STABLE
INCOMPATIBILITY WITH OTHER MATERIALS: PRODUCT WILL SLOWLY CORRODE IRON, BRASS, COPPER, ALUMINUM, MILD STEEL.
HAZARDOUS DECOMPOSITION PRODUCTS: HCl
HAZARDOUS POLYMERIZATION: NONE KNOWN

XI. TOXICOLOGICAL INFORMATION

NO DATA AVAILABLE

XII. ECOLOGICAL INFORMATION

NO DATA AVAILABLE

XIII. DISPOSAL CONSIDERATIONS

WASTE DISPOSAL METHOD: USE UNTIL LESS THAN ONE INCH REMAINS IN CONTAINER. TRIPLE RINSE CONTAINER WITH WATER, ADD TO OPERATION. REMOVE OR DEFACE CONTAINER LABEL BEFORE SELLING OR DISPOSAL. CONTAINS NO PHOSPHATES.

MATERIAL SAFETY DATA SHEET

Page 3 of 3
Revised 6/30/93
Replaces (None)
Printed 6/18/93

ICA-503

MSDS ID: 02442

XIV. TRANSPORT INFORMATION

HAZARDOUS MATERIALS DESCRIPTION/PROPER SHIPPING NAME:
D.O.T. CLASS: COMPOUNDS, WATER CLARIFYING, LIQUID, N.O.I.

XV. REGULATORY INFORMATION

U.S. FEDERAL REGULATIONS:
CERCLA/EPCRA: SECTION 313 TOXIC CHEMICALS:
NONE
LISTED CARCINOGEN: NONE
NTP: NO IARC: NO OSHA: NO
HMIS RATINGS: HEALTH: 1 FIRE: 0 REACTIVITY: 0
PERSONAL PROTECTIVE EQUIPMENT: B
STATE RIGHT-TO-KNOW INFORMATION:
ALUMINUM CHLOROHYDRATE - CAS # 1327-41-9
WATER - CAS # 7732-18-5.

XVI. OTHER INFORMATION

THE INFORMATION IN THIS MSDS RELATES TO THIS SPECIFIC MATERIAL. IT MAY NOT BE VALID FOR THIS MATERIAL IF USED OTHER THAN AS RECOMMENDED BY DUBOIS CHEMICALS OR IN COMBINATION WITH OTHER MATERIALS. IT IS THE USER'S RESPONSIBILITY TO EVALUATE THE APPLICABILITY OF THIS INFORMATION FOR HIS PARTICULAR CONDITIONS OF STORAGE, HANDLING AND USE.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Indianapolis, Indiana 46206-6015
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(800) 451-6027
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July 7, 1999

Mr. Robert Choate
Oxford Automotive, Inc.
1250 Stephenson Hwy.
Troy, MI 48083

Dear Mr. Choate:

Re: Special Waste Certification
#60033, 40010, 60281, and 60287
Oxford Suspension, Inc.
Hamilton, Steuben County

This is in response to your letter dated June 9, 1998, and acknowledges the facility name change from Eaton Corporation to Oxford Suspension Incorporated. Your letter explaining this transaction will be placed in our files for future reference.

The Special Waste Certifications 60033 expiration February 1, 2001, 40010 expiration January 30, 1999, 60281 and 60287 expiration May 13, 2001, remain in effect until said expiration dates as long as all processes and raw materials remain the same. Amendments to the above mentioned certifications to reflect the facility name change are enclosed.

Thank you for your notification of this change. If you have any questions pertaining to this matter, please contact Marcia Earl of my staff at 317/233-2823.

Sincerely,

Rosemary Cantwell

Rosemary Cantwell, Chief
Special Waste Section
Solid Waste Compliance Branch
Solid and Hazardous Waste Management

enclosure

cc: Mel Simpson: Oxford Suspension, Inc., 7825 South Homestead Dr., Hamilton, IN 46742-0070

SPECIAL WASTE CERTIFICATION APPLICATION

Cashier, Room N1324
Indiana Department of Environment Management
100 N. Senate Avenue
P.O. Box 7060
Indianapolis, Indiana 46206-7060
Telephone: 317/232-3111

FOR OFFICE USE ONLY
Reviewer: Workman
Application No. 80144

1. Generator Fee

Generator Fee: $250. per application PAID BY: 4288 (Check # or Money Order #)

2. Generator Information

Generator Facility Location	Generator Mailing Address
Name Wabash Mfg	Name Wabash Mfg
Address 1400 E. Haward	Address P.O. Box 754
Kokomo IN 46901 (City) (State) (Zip)	Kokomo IN 46903-0754 (City) (State) (Zip)
County Howard	County Howard
Technical Contact and Telephone # 765-452-5694 Roger Lindsey	Technical Contact and Telephone # Same,

EPA Identification Number: IND 000 052 930

3. Contractor Information

Applicant (if other than generator)	Proposed Disposal Site
Name WM of Central Indiana	Name Oak Ridge Opp No. 9-2
Address 740 N. Ohio P.O. Box 446	Address P.O. Box 1038
Kokomo IN 46903-0446 (City) (State) (Zip)	Pendleton IN 46064 (City) (State) (Zip)
Technical Contact and Telephone # 765-459-8112 Ed Frederickson	Technical Contact and Telephone # Rick Young 219-722-5771
☒ Check box if you want a copy of certification	

4. Regulatory Issues

Are the waste(s) related to any of the following occurring at your facility: (please check)

CERCLIS Clean- up ☐ Hazardous/Solid Waste Enforcement ☐ Corrective Action ☐

Air/Water Issues ☐ No Issues ☐ Other _____

8/96

Special Waste Certification Application (page 2 of 4)

List below in section 5 the waste stream for which certification is being requested under this application. If a number of similar waste streams are being combined for certification purposes (see instructions), list all the waste streams included within this combination. Separate applications must be submitted for each waste stream or each combination of waste streams requiring certification.

5. Waste(s) Information	
Waste(s) Name(s)	Previous Certification No. (if applicable)
1.) Waste water treatment filter cake	
2.)	
3.)	
4.)	
5.)	
6.)	
7.)	
8.)	
9.)	
10.)	

Anticipated annual disposal quantity: Unknown at this time 32 yds

Check box if this is a one-time only disposal ☐

Type of disposal containers(s) to be used: Rolloff

6. Sampling and Laboratory Information	
Laboratory	**Sample Collector**
Name LWM	Name Yorkshire Yard
Address 2100 Clearwater Dr	Address 1400 E. Hawley
Geneva IL 60134	Kokomo IN 46901
(City) (State) (Zip)	(City) (State) (Zip)
Technical Contact and Telephone # Karl Hacker 630-208-3100	Telephone # 765-452-5694

Special Waste Certification Application (page 3 of 4)

If certification is being requested for a combination of similar waste streams under this application, complete this page for each waste stream included in that combination.

7. Waste Characterization		
Is the waste a listed hazardous waste as defined in 329 IAC 3.1?	Yes ____	No X
Does this waste contain PCB's or PCB items as defined in 329 IAC 4?	Yes ____	No X
Physical Characteristics: (attach MSD Sheets if Available)		
Physical state: Solid		
Percent solids 100 %		
Fire, explosion, or spontaneous ignition hazard?	Yes ____	No X
Does this waste contain: Free liquids? NO	Asbestos? NO	Solvents? ____
Oder? None X	Mild ____	Strong ____ Describe:
Analytical Information		
Sampling: Date sample was collected: 4-29-98	Sample type: grab ____	composite X
Was a sampling plan used? Yes ____	No X	If so, provide a copy if requested (see instructions).
Is the sample representative of the waste? YES		
Results: attach original laboratory documentation i.e. TCLP metal, pesticide, organic, corrosivity. ignitability, reactivity, or other. (Provide QA/QC upon request).		

8. Process Description (attach additional pages if necessary)

Special Waste Certification Application (page 4 of 4)

9. Generator Signature

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violation. I further certify that I am authorized to submit this information". (329 IAC 10-8-6 (c))

Roger D. Glendening — ROGER D. GLENDENING — 5-13-98

Signature (type or print name) Date

PRODUCTION MGR. / PLANT SUPT.

Title

Sample Id: 200099440 **Waste Profile No:** MILBANK **Lab Asystant No:**

FINGERPRINT	Result	Date Entered	Analyst
Odor Incidental	NONE	05/02/98	MRW
Layering	SINGLE PHASE	05/02/98	MRW
Pct Free Liquids	0	05/02/98	MRW
L1: Color	BRN	05/02/98	MRW
L1: Physical State	SOLID	05/02/98	MRW
L1: Pct Of Sample	100	05/02/98	MRW
L1: Gen Description	WHOLE	05/02/98	MRW
L1: Further Descrip	SLUDGE	05/02/98	MRW
pH - Meter	9.94	05/02/98	MRW
pH Method	10% SOLUTION	05/02/98	MRW
Paint Filter	PASS	05/02/98	MRW
Paint Filter Method	ACTUAL	05/02/98	MRW

COMMENTS:

No FINGERPRINT Comments

WET CHEMISTRY	Result	Unit	Date Entered	Analyst
Total Residue @ 105 C	>99	percent	05/04/98	JH
Ash Content, On Ignition	29.9	percent	05/04/98	JH
Cyanides, As CN Total	< 0.5	ppm	05/05/98	AN
Reactive Sulfide	<50	ppm	05/05/98	AN
Flash Point - Open Cup	>175	fahrenheit	05/02/98	MRW

COMMENTS:

No WET CHEMISTRY Comments

SPECTROSCOPY	Result	Unit	Date Entered	Analyst
Arsenic - TCLP	<0.11	mg/L	05/05/98	MTS
Barium - TCLP	0.23	mg/L	05/05/98	MTS
Cadmium - TCLP	<0.004	mg/L	05/05/98	MTS
Chromium - TCLP	0.06	mg/L	05/05/98	MTS
Copper - TCLP	4.5	mg/L	05/05/98	MTS
Lead - TCLP	<0.10	mg/L	05/05/98	MTS
Mercury - TCLP	<0.00014	mg/L	05/05/98	JG
Nickel - TCLP	0.06	mg/L	05/05/98	MTS
Selenium - TCLP	<0.25	mg/L	05/06/98	MTS
Silver - TCLP	0.02	mg/L	05/05/98	MTS
Zinc - TCLP	89.8	mg/L	05/06/98	MTS
Initial pH - TCLP	10.05		05/01/98	JH
Final pH - TCLP	5.26		05/02/98	MRW
Start Date/Time - TCLP	5-1-98/5:00PM		05/01/98	JH
Stop Date/Time - TCLP	05-02-98/9AM		05/02/98	MRW

COMMENTS:

BATCH ID TCLP HG 050498A3HG
ICP TCLP BATCH ID - 9805ICP202

SOLID PCBS - LOW LIMIT	Result	Unit	Date Entered	Analyst
Total Arochlors is	< 2	ppm	05/06/98	TB

Analytical Report

WMX Technology Center

2100 Cleanwater Drive - Geneva, Illinois 60134-3310
Phone: 630 208-3100 - Fax: 630 208-1175

Report Date:	May 7, 1998
WMX TC ID:	200099440
Date Sampled:	29-APR-98
Date Logged:	01-MAY-98
Client Profile Number:	MILBANK
Source:	MIN
Client Name:	MILBANK MFG
Client Location:	
Sample Name:	WWT FILTER CAKE
Client Number:	

CERTIFICATION: All analysis was completed under my direction following the applicable regulatory or company method unless otherwise annotated.

Approved: Karl Hacker

Sample Id: 200099440 Waste Profile No: MILBANK Lab Asystant No:

SOLID PCBS - LOW LIMIT (continued):	Result	Unit	Date Entered	Analyst

COMMENTS:

gd7e41

TC SEMI	Result	Unit	Date Entered	Analyst
Cresol Total	< 100	mg/L	05/05/98	
O-Cresol	< 100	mg/L	05/05/98	
M-Cresol + P-Cresol	< 100	mg/L	05/05/98	
1,4-Dichlorobenzene	< 3.25	mg/L	05/05/98	
2,4-Dinitrotoluene	< 0.065	mg/L	05/05/98	
Hexachlorobenzene	< 0.065	mg/L	05/05/98	
Hexachloro-1,3-Butadiene	< 0.25	mg/L	05/05/98	
Hexachloroethane	< 1.5	mg/L	05/05/98	
Nitrobenzene	< 1	mg/L	05/05/98	
Pentachlorophenol	< 50	mg/L	05/05/98	
Pyridine	< 2.5	mg/L	05/05/98	
2,4,5-Trichlorophenol	< 200	mg/L	05/05/98	
2,4,6-Trichlorophenol	< 1	mg/L	05/05/98	

COMMENTS:

v5v20

TC VOA	Result	Unit	Date Entered	Analyst
Benzene	< 0.25	mg/L	05/06/98	
Carbon Tetrachloride	< 0.25	mg/L	05/06/98	
Chlorobenzene	< 50	mg/L	05/06/98	
Chloroform	< 3	mg/L	05/06/98	
1,2-Dichloroethane	< 0.25	mg/L	05/06/98	
1,1-Dichloroethylene	< 0.35	mg/L	05/06/98	
Methyl Ethyl Ketone (Mek)	< 100	mg/L	05/06/98	
Tetrachloroethylene	< 0.35	mg/L	05/06/98	
Trichloroethylene	< 0.25	mg/L	05/06/98	
Vinyl Chloride	< 0.1	mg/L	05/06/98	

COMMENTS:

pja19

ZHE - SAMPLE PREP	Result	Unit	Date Entered	Analyst
Complete Date/Time- ZHE	05-05-98/8:00A	none	05/04/98	SW
Starting Date/Time- ZHE	05-04-98/6:00P	none	05/04/98	SW

COMMENTS:

No ZHE - SAMPLE PREP Comments

WASTE MANAGEMENT TECHNOLOGY CENTER, INC.
CHAIN OF CUSTODY

WM Technology Center, Inc.
2100 Cleanwater Drive, Geneva, Illinois 60134
Client Services: (630) 208-3100 Fax: (630) 208-1175

WM Tech. Ctr. Use Only

LIMS ID #:

SAMPLE IDENTIFICATION	SAMPLE SIZE	DATE COLLECTED	SAMPLE MATRIX	ANALYSIS REQUESTED
Milbank MFG WWT Filter Cake	1Qt	4-29-98		RI Panel, PCB's in Dry weight, TCLP Copper, Zinc, Nickel

SPECIAL INSTRUCTIONS

DATE DUE: 5 DAY___ 7 to 10 DAY___ 10 to 14 DAY___ 15 to 21 DAY___ 21 DAY or greater___

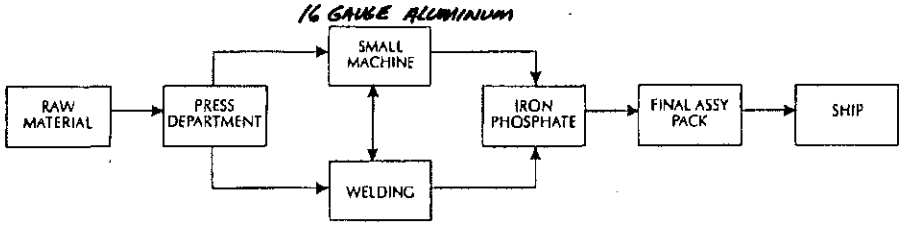
Customer Location:
Contact:
Phone Number:
Fax Number:

Billing Location: WM of Central Illinois
Report Distribution Contact: P. DeFrederico
Report Distribution Address:
Report Distribution Fax #: 765-459-0455 Fax, Hardcopy or (both)?

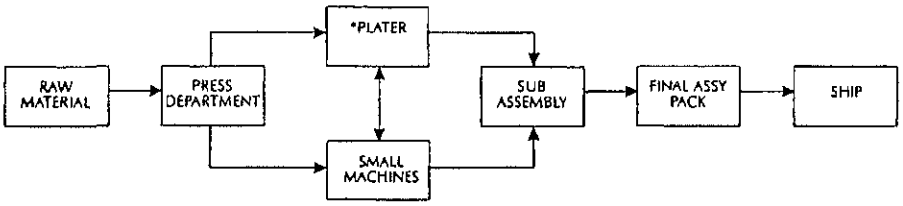
RELINQUISHED BY	DATE	TIME	RECEIVED BY	DATE	TIME
[illegible]	4/29/98	AM/PM	[illegible]	5/1-98	AM/ PM
		AM/ PM			AM/ PM

ELECTRIC METER ENCLOSURE

GALVANIZED
16/14 GAUGE MATERIAL
16 GAUGE ALUMINUM



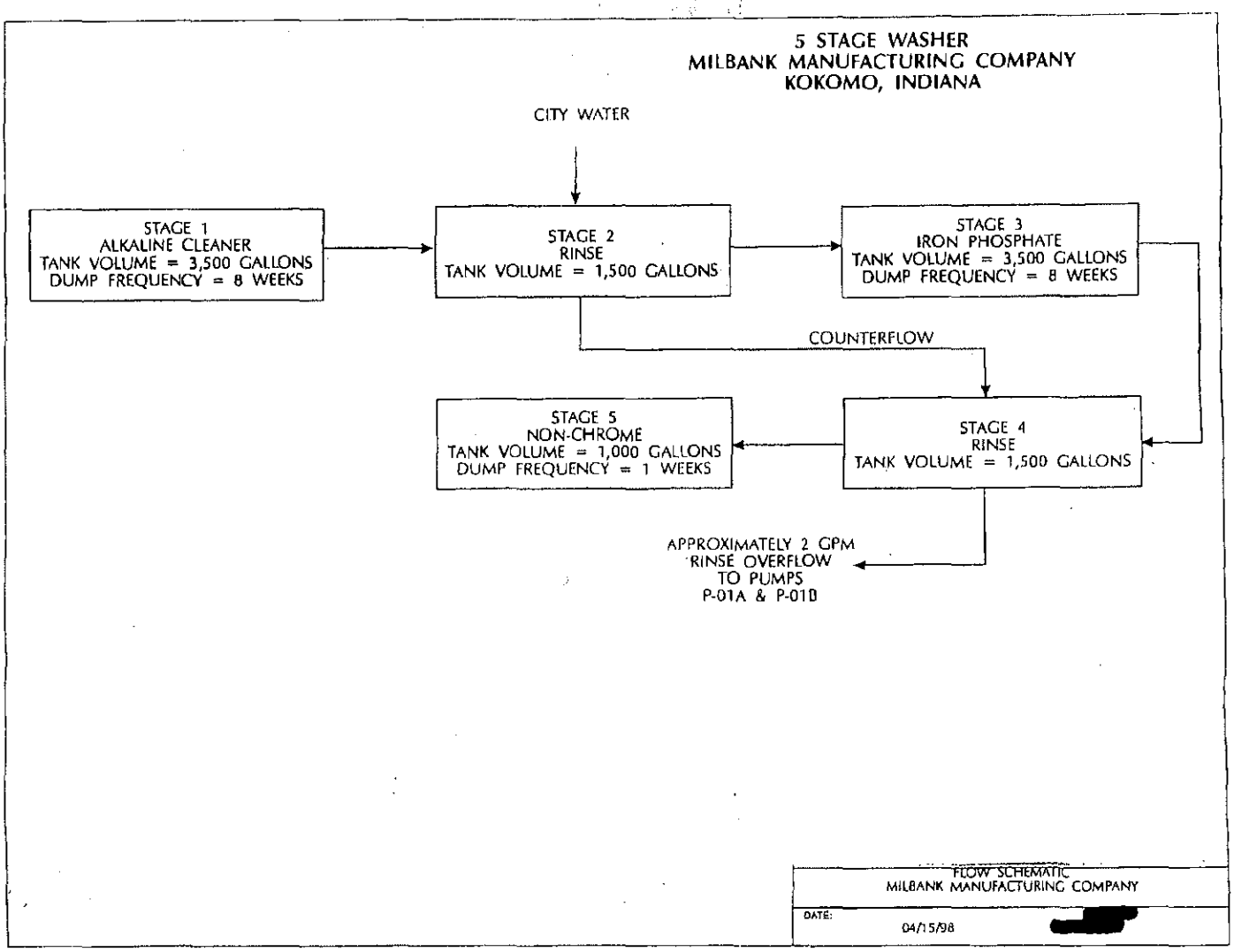
COPPER/ALUMINUM
SMALL PARTS



* PLATING WILL BE BY OFF-SITE SOURCE.

MATERIAL FLOW DIAGRAM
MILBANK MANUFACTURING COMPANY

DATE: 04/15/98 [redacted]


5 STAGE WASHER
MILBANK MANUFACTURING COMPANY
KOKOMO, INDIANA
CITY WATER
STAGE 1
ALKALINE CLEANER
TANK VOLUME = 3,500 GALLONS
DUMP FREQUENCY = 8 WEEKS
STAGE 2
RINSE
TANK VOLUME = 1,500 GALLONS
STAGE 3
IRON PHOSPHATE
TANK VOLUME = 3,500 GALLONS
DUMP FREQUENCY = 8 WEEKS
COUNTERFLOW
STAGE 5
NON-CHROME
TANK VOLUME = 1,000 GALLONS
DUMP FREQUENCY = 1 WEEKS
STAGE 4
RINSE
TANK VOLUME = 1,500 GALLONS
APPROXIMATELY 2 GPM
RINSE OVERFLOW
TO PUMPS
P-01A & P-01B
FLOW SCHEMATIC
MILBANK MANUFACTURING COMPANY
DATE:
04/15/98
[redacted]

U E: TANK #5

ICA-503

Final Rinse Additive

Nonchrome final seal

Patented technology #5128211

Enhances corrosion resistance after painting

Easily automated for effective control

General Description:
ICA-503 rinse additive is a nonchromated liquid sealer used after phosphatizing. It is formulated for use in either spray washers or immersion tank systems with excellent drying capabilities.

Benefits:
ICA-503 nonchromated final rinse additive provides a sealing action over iron phosphate that improves paint adhesion and extends resistance of painted surfaces to premature corrosion.

Typical Properties:

Appearance	Clear Liquid
Density @ 78° F	11.18 lb/gallon
pH of Concentrate	3.6+/-0.2
pH of 1% solution	4.8+/-0.2

Using Procedures:
ICA-503 is designed to be used at very low concentrations. It has been used as a final rinse pH adjuster. The pH of the final rinse tank should be kept between 5.0-6.0. It does not take very much ICA-503 to lower the pH of fresh final rinse tank. Add small amounts while mixing until the desired pH is reached. For best control use an ACIDTROL or other pH control device to maintain the tank pH between 5.0-6.0. Exact feed rate of ICA-503 cannot accurately be determined due to the inconsistency of various water supplies. Therefore this will have to be determined as used in the account.

Other usage recommendations should be specifically covered by the APPLICATIONS ENGINEERING DEPARTMENT.

Tank life will depend on carry over from previous tanks and work load. Generally, a 500 gallon tank should be dumped once a week. A 1,000 gallon tank should be dumped every two weeks. Larger tank life should be determined by the account and the servicing DuBois representative.

...RE-8:00-5:00 EST-MON-FF 1-800-543-4906 ...CHEMTREC (COLLECT) 303-592-102... 1-800-424-930...

MANUFACTURER: DIVERSEY CORP. 12025 TECH CENTER DRIVE LIVONIA, MICHIGAN 48150 PREPARED BY: M. ANTOSIA ON 04/02/91

EMERGENCY PHONE NO. 313-458-5000

REFERENCE

ABBREVIATIONS ..C-CEILING..MP-MAXIMUM PEAK..N/A-NOT APPLICABLE..N/K-NOT KNOWN..P-POTENTIAL..PEL-PERMISSIBLE EXPOSURE LIM...T..PM-PENSKY MARTENS..S-SKIN..ST-SHORT TERM..TLV-THRESHOLD LIMIT VALUE..TWA-TIME WEIGHTED AVERAGE..

SECTION-1 IDENTITY

COMMON NAME USED ON LABEL: ICA-503 CODE: 02442

CHEMICAL FAMILY: FINAL RINSE ADDITIVE

SECTION-2 HAZARDOUS INGREDIENTS (ALL ITEMS LISTED ARE HAZARDOUS BY TITLE 29CFR 1910.1200)

PRINCIPAL HAZARDOUS COMPONENT(S) CHEMICAL & COMMON NAME	%	EXPOSURE LIMITS (TWA 8 HOUR UNLESS OTHERWISE SPECIFIED)	UNITS
NONE			

SECTION-3 PHYSICAL & CHEMICAL CHARACTERISTICS (FIRE & EXPLOSION DATA)

BOILING POINT: 220 °F | SPECIFIC GRAVITY: 1.34 | VAPOR PRESSURE: N/A mmHg @ °C | VOLATILE BY VOLUME: 50%

VAPOR DENSITY (AIR=1): N/A | EVAPORATION RATE (n-BUTYL ACETATE=1): N/A | SOLUBILITY IN WATER: 100 % | REACTIVITY IN WATER: / | HEAT EVOLUTION: NONE

APPEARANCE & ODOR: CLEAR TO SLIGHTLY HAZY LIQUID: NO ODOR

FLASH POINT: N/A °F | FLAME EXTENSION: N/A in. | FLAMMABLE LIMITS IN AIR BY VOLUME: LOWER N/A UPPER N/A | AUTO IGNITION TEMPERATURE: N/A °F

EXTINGUISHER MEDIA: CO2, DRY CHEMICAL, FOAM, WATER

FIREFIGHTING SPECIAL PROCEDURES: MAY DECOMPOSE TO HYDROGEN CHLORIDE IN A FIRE. IF FUMES ARE PRESENT, WEAR SELF CONTAINED BREATHING APPARATUS.

UNUSUAL FIRE AND EXPLOSION HAZARDS: NONE

SECTION-4 PHYSICAL HAZARDS

STABILITY: STABLE | POLYMERIZATION: NONE KNOWN

INCOMPATIBLE WITH: PRODUCT WILL SLOWLY CORRODE IRON, BRASS, COPPER, ALUMINUM, MILD STEEL.

DECOMPOSITION PRODUCTS: HCl

SECTION-5 HEALTH HAZARDS

PRIMARY ROUTES OF ENTRY: INHALATION NO | SKIN NO | INGESTION YES

1. ACUTE SIGNS AND SYMPTOMS OF OVEREXPOSURE: MAY CAUSE EYE IRRITATION

2. CHRONIC: SAME AS ACUTE

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE: SENSITIVE SKIN

LISTED CARCINOGEN: NONE | NTP: NO | IARC: NO | OSHA: N

EMERGENCY AND FIRST AID PROCEDURES

1. INHALATION: N/A IN NORMAL OPERATION.

2. EYES: FLUSH THOROUGHLY WITH FRESH WATER FOR AT LEAST 15 MINUTES. GET MEDICAL ATTENTION.

3. SKIN: FLUSH WITH FRESH WATER, WASH WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHES AND SHOES.

4. INGESTION: GIVE MILK OR WATER. DO NOT INDUCE VOMITING. GET MEDICAL ATTENTION.

SECTION-6 SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: NONE

VENTILATION MECHANICAL: NONE | SPECIAL: NONE | VENTILATION LOCAL: ADEQU...

PROTECTIVE GLOVES: NON-ABSORBENT

EYE PROTECTION: SAFETY GLASSES

OTHER PROTECTIVE CLOTHING/EQUIPMENT: NONE

SECTION-7 SPECIAL PRECAUTIONS AND SPILL/LEAK PROCEDURES

HANDLING AND STORAGE PRECAUTIONS: DO NOT PRESSURIZE CONTAINER TO EMPTY. IF FROZEN, THAW AND MIX TO MAKE USABLE.

OTHER PRECAUTIONS: D.O.T. CLASS: NOT REGULATED.

IF MATERIAL IS RELEASED/SPILLED: FLUSH SMALL AMOUNTS TO DRAIN. COLLECT AND RETURN LARGE SPILLS TO CONTAINER.

WASTE DISPOSAL METHODS: USE UNTIL LESS THAN ONE INCH REMAINS IN CONTAINER. TRIPLE RINSE CONTAINER WITH WATER, ADD TO OPERATION. REMOVE OR DEFACE CONTAINER LABEL BEFORE SELLING OR DISPOSAL. CONTAINS NO PHOSPHATES.

HMIS RATING: HEALTH 1 | FLAMMABILITY 0 | REACTIVITY 0 | PERSONAL PROTECTION B

SARA TITLE III SECTION 313: NONE

STATE OF PA RIGHT TO KNOW INFORMATION: ALUMINUM CHLOROHYDRATE- CAS # 1327-41-9